



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
LIVERNOS CENTER

US EPA RECORDS CENTER REGION 5



505677

303 S. LIVERNOS AVENUE
DETROIT, MICHIGAN 48209

E.1
9/29/94

September 29, 1994

Mr. Jerome S. Amber, Manager
Ford Motor Company -
Wastes and Hazardous Substances
Environmental Quality Office
15201 Century Drive, Suite 608
Dearborn, MI 48120

RE: Allen Park Landfill - PCB Disposal Issue

The Detroit Water and Sewerage Department ("Department") requests a meeting with Ford Motor Company to address outstanding issues regarding the Allen Park Clay Mine Landfill site. Although we have received some information, we have not received enough information on the project to make a decision which would address all the technical and non-technical issues. As an environmentally conscious public agency, the Department's objective is to reach a decision only after full consideration of all of the salient facts and information concerning the site. Our duty to the public and to the local environment of Southeastern Michigan demands nothing less.

The September 1992 Consent Order, under which the Allen Park Landfill currently operates, neither contemplates nor authorizes a discharge of leachate from an additional proposed TOSCA licensed cell dedicated to the disposal of PCBs. The Department believes Ford must request a modification to the Consent Order and receive the approval of the Department before the release of any new discharge from the site. Due to the complexity of the issues surrounding the site, and the number of individuals involved in this matter, the Department wishes to expedite the review process. By copy of this letter, the Department requests that any action the Environmental Protection Agency or the Michigan Department of Natural Resources anticipates taking, be held in abeyance until Ford Motor Company has had an opportunity to respond to this letter and meet with the Department.

The following minimal information is needed from Ford Motor Company regarding the Allen Park Clay Mine Landfill and the proposed project before the Department can issue a final decision on the matter.

A. River Raisin Project

1. What is involved in and/or proposed for the River Raisin cleanup? In short, fully describe the project including but not limited to the proposed remediation plan.
2. What limitations or restrictions are there on the types of materials which will be accepted at the Allen Park Landfill from the River Raisin?
3. What will be the nature and condition of the materials proposed for burial at Allen Park, that is, solid, liquid, drums, etc.? What conditioning will the material be subjected to, e.g., dewatering (to what %solids)? Will the landfill accept regulated wastes from any source as authorized by TOSCA?

DENNIS W. ARCHER, MAYOR

4. What is the anticipated duration of the project from mobilization to final reporting?

5. Please submit a copy of any Consent decree, Administrative Order or other document mandating or authorizing the cleanup and a copy of any proposed work plan, remedial investigations/field studies or related documentation.

B. TOSCA Application

1. Please provide a copy of any and all feasibility and engineering studies performed, conducted, or authorized by Ford Motor Company with respect to its TOSCA permit application.

2. Please provide any analyses, assessments, studies, or evaluations of the impact of the proposed TOSCA facility on any existing, or proposed sewers or water lines servicing or in close proximity to the landfill.

3. Please provide any analysis made on the potential of PCB or other pollutants present in the leachate, to pass-through to the Detroit publicly owned treatment works.

Please identify all measures which Ford Motor Company can and will take to prevent or alleviate the potential for pass-through or interference.

4. What are the nature and types of materials which are proposed for acceptance at the TOSCA cell? Please submit any and all marketing plans, business plans or target markets related to the use of the TOSCA licensed facility.

5. Please provide any and all evaluations, documentation, data, studies or analyses of alternatives to discharge into the Detroit water and sewer system, including but not limited to use of the existing stormwater discharge connection, for which a stormwater permit application is presently pending before the Michigan Department of Natural Resources, or other potential direct discharge alternatives.

6. Please submit any and all information regarding the volume or character of leachate from the proposed PCB cell at the landfill, including proposed monitoring plans (including monitoring pattern and frequency), and the flow and volume of leachate from the TOSCA cell. Please include any anticipated seasonal variations in these operations.

7. Please submit copies of any environmental assessments, or any environmental risk analyses performed, conducted, or authorized by Ford Motor Company with respect to its TOSCA permit application.

C. Allen Park Clay Mine Landfill

1. Please provide a copy of any documentation, analyses, assessments, studies, information or data which Ford Motor Company has relied upon,

reviewed or received in evaluating the potential for infiltration of PCBs into the existing landfill operation, including but not limited to the interrelationship or interaction of the leachate from the entire landfill with the leachate from the proposed new TOSCA cell.

2. Is there any treatment being contemplated at the site to pre-treat this proposed new wastestream? If not, why not. Please submit a copy of all feasibility studies, assessments, analytical data and/or test results evaluating the feasibility of any proposed treatment system at the site.

3. Please provide any and all analyses, assessments, documentation or studies Ford Motor Company has relied on, prepared or reviewed in assessing the capabilities of activated carbon or other treatment systems to remove PCBs from any leachate generated from the TOSCA cell.

4. Please submit any and all existing data regarding PCB concentrations in the leachate of the landfill.

5. Please provide any and all existing information regarding the volume and character of leachate and water from the landfill. Include any information on the volume of artesian spring water.

We have attempted to be as descriptive as possible in articulating the information we need to properly assess the matter. Following the submission of the requested information, the Department will need some time for review and to evaluate the information. A meeting can be arranged after we have assessed the information submitted. Please contact me at (313) 297-9401 if you have any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Stephen J. Kuplicki". The signature is stylized with a large, looped initial "S" and a trailing flourish.

Stephen J. Kuplicki, P.E.
Manager, Industrial Waste Control Division

CC list:

Margaret M. Synk
MDNR - Surface Water Quality Division
Southeast Michigan District Office
38980 Seven Mile Rd.
Livonia, MI 48152

Rich Powers
MDNR - Surface Water Quality Division
Knapp Centre - 2nd Floor
P.O. Box 30273
Lansing, MI 48909

Steve Johnson
US EPA - Region 5
Environmental Sciences Division (PCB-14J)
77 West Jackson Blvd.
Chicago, IL 60604

Pablo Valentine
US EPA - Region 5 (HSRW-6J)
Superfund Branch
77 West Jackson Blvd.
Chicago, IL 60604

Peter Swenson
US EPA - Region 5 (WC-155)
Water Compliance Branch
77 West Jackson Blvd.
Chicago, IL 60604

Tim O'Brien
Ford Motor Company
15201 Century Drive, Suite 602
Dearborn, MI 48120

A. Williams
Cooper Fink & Zausmer
31700 Middlebelt, Suite 150
Farmington Hills, MI 48334-2374

D. Alexander
DWSD-Law Dept.
Water Board Building
Detroit, MI 48226

G. Fujita
DWSD-Administration
Livernois Center
303 S. Livernois
Detroit, MI 48209

Rollie Harmes, Director
MDNR - Executive Branch
Mason Bldg. - 7th Floor
P.O. Box 30028
Lansing, MI 48909

J. Scherbarth
Assistant Attorney General
Environmental Protection Division
P.O. Box 30212
Lansing, MI 48909

Sebastian Patti
Office of Regional Counsel
US EPA - Region 5 (CA-3T)
77 West Jackson Blvd.
Chicago, IL 60604

Donna Keclik
US EPA - Region 5 (WC-155)
Water Compliance Branch
77 West Jackson Blvd.
Chicago, IL 60604

F. Patrick Nixon
Ford Motor Company
15201 Century Drive, Suite 1800
Dearborn, MI 48120

Phyllis James
City of Detroit - Law Dept.
City-County Building
Detroit, MI 48226

S. Gorden, Director
DWSD-Administration
Water Board Building
Detroit, MI 48226

K. Leavey, Deputy Director
DWSD-Administration
Water Board Building
Detroit, MI 48226

Russ Harding
MDNR - Executive Branch
Mason Bldg. - 7th Floor
P.O. Box 30028
Lansing, MI 48909